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DIRECT DIAL NUMBER:

April 7, 1988

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Russell H. Wyer, Director
Hazardous Site Control Division
(Attn: NPL Staff)
Office of Emergency and
Remedial Response
(WH-548-E)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

RE: Comments of Theodore Sall, Inc. on
Proposed Amendment to National
Priorities List (Update 5)

Dear Mr. Wyer:

With respect to the Eastern Diversified Metals Site in Hometown, Schuylkill County, Pennsylvania, I am enclosing a copy of the two-volume Work Plan for a Remedial Investigation/Feasibility Study at the Site. The Work Plan was approved by Region III on March 25, 1988 (copy of approval letter by Suzanne Billings enclosed). This submission is intended as a supplement to the Comments submitted by this firm on behalf of Theodore Sall, Inc. on August 8, 1986. In the last paragraph of our August 8, 1986 cover letter, we noted the reservation of our right to supplement the original Comments.

We direct your attention in particular to the QA/QC Audit of Historical Data performed in preparation of the Work Plan, which relates to EPA's improper application of the HRS model and score sheet (see 1986 General Comment No. 5, page 5), and which shows that:

1. The EP Toxicity Test methodology used for the 1984 solid waste tests by Todd Giddings Associates, Inc. ("TGAI") is "unacceptable" (W.P. §2.5.2.2, page 34). This test was performed solely at the insistence of the Pennsylvania Department of Environmental Resources ("PA DER") (W.P. §2.5.2, page 28) and then relied upon by EPA in scoring this site. Region III concurred with the conclusion stated in the Work Plan (pages 28, 34) that

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the reported concentrations of EP Toxicity metals in solid waste samples do not reflect actual conditions at the Site.

2. The analyses performed by EPA's contractor, NUS, in April 1984 were determined to be "unacceptable" for: the downgradient well sample, the organic compounds in three surface water samples (collected upstream of overflow, midstream and downstream), all organic compounds in the surface water sediment sample, all organic samples taken from the main and secondary leachate seeps, the organic samples of the main and lower leachate sediments and a secondary leachate sediment sample, and the organic sample of surface soil (W.P. §§2.5.2.2, 2.5.3.2, 2.5.4.2, 2.5.5.2, 2.5.6.2, 2.5.7.2, and 2.5.10.2).

These sample analyses were also relied upon by EPA in scoring the Site for the NPL, while EPA ignored sample analyses performed by TGAI that were deemed "acceptable" for QA/QC, even though TGAI's data had been made available both to PA DER and EPA.

The entire Work Plan, including all data, constitutes this supplemental comment; the above points are examples for illustrative purposes only.

Sincerely,


HEATHER C. WINETT

encl.

cc: Kenneth R. Kryszcun (3HW23)
Cecil Rodrigues (3RC22) (w/out encl.) /
Suzanne Billings (3HW12) (w/out encl.)

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